

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

Parker Tirrell, by her parents and next friends Sara Tirrell  
and Zachary Tirrell, *and*

Iris Turmelle, by her parents and next friends Amy  
Manzelli and Chad Turmelle,

Plaintiffs.

v.

Civil Action No. 1:24-cv-00251-  
LM-TSM

Frank Edelblut, *in his official capacity as Commissioner of  
the New Hampshire Department of Education;*

Andrew Cline, Kate Cassady, Ann Lane, Philip Nazzaro,  
Rajesh Nair, James Fricchione, and James Laboe, *in their  
official capacities as members of the New Hampshire  
State Board of Education;*

Pemi-Baker Regional School District;

Lisa Ash, Bernice Sullivan, Sheila Donahue, Tony Torino,  
Carolyn Varin, Peter Jackson, Phil McCormack, Greg  
Aprilliano, Bonnie Acton, Barbara Noyes, Paul Ciotti, and  
Paul Pizzano, *in their official capacities as members of the  
Pemi-Baker Regional School Board;*

Pembroke School District; and

Andrew Camidge, Gene Gauss, Kerri Dean, and Melanie  
Camelo, *in their official capacities as members of the  
Pembroke School Board,*

Defendants.

**CORRECTED PARTIALLY<sup>1</sup> JOINT PROPOSED BRIEFING SCHEDULE ON THE  
MOTION FOR PRELIMINARY INJUNCTION**

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<sup>1</sup> This document is filed jointly by Plaintiffs, State Defendants, and Pembroke Defendants.

The Parties hereby submit their proposed briefing schedule for the preliminary injunction motion:

1. State Defendants' Objection to the Motion for Preliminary Injunction: **Saturday, August 24, 2024.**
2. Plaintiffs' Reply: **Monday, August 26, 2024.**

Further, the State Defendants stipulate as part of this agreement that they "will not be presenting affirmative evidence at the hearing, will not be contesting the Plaintiffs' evidentiary submissions, and intend to proceed on briefing and oral argument. The State Defendants dispute that a preliminary injunction is appropriate as a matter of law."

All Parties assent to the entry of this schedule.

WHEREFORE, Plaintiffs respectfully request that this Court:

1. Grant the schedule proposed above; and
2. Grant such other relief as is just and proper.

Respectfully submitted,

Parker Tirrell and Iris Turmelle

By and through their attorneys,

/s/ Kevin J. DeJong

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